COMMENT SOUGHT ON BROADBAND NEEDS IN EDUCATION, INCLUDING CHANGES TO E-RATE PROGRAM TO IMPROVE BROADBAND DEPLOYMENT

NPB PUBLIC NOTICE # 15

PLEADING CYCLE ESTABLISHED

GN Docket Nos. 09-47, 09-51, 09-137

CC Docket No. 02-6

WC Docket No. 05-195

Comment Date: November 20, 2009

Reply Comment Date: December 11, 2009

Comments for FCC:

E-rate modifications - Question 11

a. We recommend modifying the online forms to allow for granular data collection and data mining. The FCC should have the data to show what percent is used for basic voice service. Again, thinking about what information would be most useful in evaluating the program (urban/rural, etc.) and incorporating this into the forms is recommended. Some of this information (urban/rural, number of students) may be obtained from other agencies, but would likely be difficult.

b. Library applicants relate their technology plan directly to their overall strategic plan, which has been developed based on a community needs assessment in addition to other relevant factors. Library applicants consider the number and age of computers deployed, the number of users they have, the services and programs that they wish to offer to meet community needs, the demand for advanced telecommunications services, the availability of broadband in their area, the partnerships that might be advantageous, the costs they know/expect.

c. Most schools do not permit use by the general public (except perhaps after normal school hours) due to safety and security concerns. However, the more the E-rate rules allow for schools and libraries in the same communities to collaborate on receiving higher broadband, and especially collaborating with other public and even private entities in the same communities, and apply for E-rate for all eligible entities, the more flexibility and opportunity collaborating institutions would have to aggregate for efficiencies in structure, capacity, and funding.

d. Expanding the class of eligible users to higher education and other categories of institutions would assist in establishing collaborations to achieve efficiencies as described above; BUT the resources available to support E-rate MUST be increased if these entities are declared eligible for E-Rate support.

e. Funds for equipment are not a major issue for public libraries in our state. Training on technology is also readily available. While equipment and training are necessary to implement effective broadband services, expanding the program to include these would detract from the focus of the program.

f. We recommend that the nationwide broadband map (when completed) be evaluated to determine where building a WAN is the best solution to bring broadband to areas where it does not exist.

g. Filtering requirements under the Children?s Internet Protection Act (CIPA) are an impediment to E-Rate participation for many libraries and communities.

E-Rate Disbursement ? Question 12

a. Based on our experience, verifying Internet speed/level of connectivity is difficult, due to inexperience and lack of knowledge on the local level. However, if there were a standard, easy to use tool for measuring connectivity and this could be pegged to need, it would make a great deal of sense to focus on those eligible entities with the greatest need.

b. We believe the existing criteria help benefit those with the greatest need.

c. The current requirements make it burdensome to collect and coordinate the information needed to apply for E-rate across many partners.

d. The level of broadband connectivity needed by a library will vary depending on the size of its service population/facilities/services offered. A goal is laudable, but one size does not fit all. However, a national vision may inspire communities to work to get and support higher connectivity for their schools and libraries. We would expect this to expand the demand for E-rate funding.

E-rate funding ? Question 13

a. Currently, libraries are not utilizing E-rate to the extent they could. As we work to increase library use of E-rate, funding additional services not currently covered could affect the ability of a library to get a discount on connectivity itself. Costs increase; so indexing the cap to inflation would help the total fund keep up with demand.

b. The more that priority one requests are funded, the fewer priority two requests could be funded.

c. While we do not have an exact amount to offer, we can say that a survey funded by the Bill and Melinda Gates Foundation this year found just under 200 public library outlets in Texas WITHOUT broadband connections of at least 1.5 Mbps. Since the solution for each of these communities will vary, it is impossible now to place a dollar value on upgrades to broadband for these libraries.

d. Decreasing discounts for basic telecommunications would discourage libraries from applying for E-rate. If discounts for Internet access were also decreased, it would have a detrimental effect on acquisition and sustainability of broadband.

e. We believe the E-rate program should carefully focus on elements most essential for schools and libraries to acquire broadband services.

f. Upgrading personal computers and other internal equipment is not necessarily needed to upgrade connectivity to greater levels of broadband. The need to do so will be very site specific. Many libraries cannot accommodate more computers/users without upgrades to their physical plant (size, electrical connections, etc.).

g. The FCC would do well to remember where students go when school is out in the afternoons and even on weekends and holidays: the public library.

h. We believe that coordination among all entities involved in working to improve connectivity in libraries would be beneficial.

Respectfully submitted,

Peggy D. Rudd
Director and Librarian
Texas State Library and Archives Commission
1201 Brazos Street
Austin, TX 78701
Voice: 512-463-5460
E-mail: prudd@tsl.state.tx.us